

**From:** John.McCullough@wellsfargo.com

**Sent:** Monday, April 08, 2013 2:17 PM

**To:** Smith, Steve C.@DIR

**Subject:** GHS Advisory Board Meeting - unfortunately cannot make the meeting but have some thoughts

Steve,

Unfortunately I cannot be at the Advisory Board meeting tomorrow on the GHS.

The first two sentences of the Summary of the Final Rule in Federal Register Volume 77, Number 58 which are highlighted below, state the reasons for the changes – “conforming and consistency, reducing cost and improve quality”. This was the reason to have made the changes.

I am just not sure that people get what “conforming and consistency, reducing cost and improving quality” is. If I were being flippant I would say that maybe we can call the California version the “CHS” for it is certainly not Global and does not reach what the spirit or reason that the Summary states.

If I were there I would ask the question, “How many more people in the State of California would become ill or die if we enacted the Federal GHS verbatim?” After a long silence or someone pontificating the answer would be clear – None.

I do not blame you or the Division but this mentality that California must be different even in something that is meant to be Global embarrasses me as a third generation Californian.

Thanks

John McCullough

[Federal Register Volume 77, Number 58 (Monday, March 26, 2012)]

<http://www.gpo.gov/fdsys/pkg/FR-2012-03-26/html/2012-4826.htm>

DEPARTMENT OF LABOR

Occupational Safety and Health Administration

29 CFR Parts 1910, 1915, and 1926

[Docket No. OSHA-H022K-2006-0062 (formerly Docket No. H022K)]

RIN 1218-AC20

Hazard Communication

AGENCY: Occupational Safety and Health Administration (OSHA), DOL.

ACTION: Final rule.

SUMMARY: In this final rule, OSHA is modifying its Hazard Communication Standard (HCS) to conform to the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS). OSHA has determined that the modifications will significantly reduce costs and

burdens while also improving the quality and consistency of information provided to employers and employees regarding chemical hazards and associated protective measures. Consistent with the requirements of Executive Order 13563, which calls for assessment and, where appropriate, modification and improvement of existing rules, the Agency has concluded this improved information will enhance the effectiveness of the HCS in ensuring that employees are apprised of the chemical hazards to which they may be exposed, and in reducing the incidence of chemical-related occupational illnesses and injuries.

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